

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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October 28, 2022

**Via Electronic Filing**

The Honorable J. Paul Oetken, U.S.D.J.  
U.S. District Court, Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Rivera v. 787 Coffee LLC et al*  
Case No.: 1:22-cv-01596-JPO

Dear Honorable Judge Oetken:

This law firm represents Plaintiffs Angel Rivera, Matt Rosenbaum, Michele Signorile-Martino, Sheridan Plunkett, Travis Reilly (a/k/a Eileen Reilly), Kienan Ludke, Allie Carter, Maya Keating, Isis Gamble, and Ty Barrett (collectively, the “Plaintiffs”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule 3(a), this letter respectfully serves to request an extension of time to complete fact discovery and depositions from October 31, 2022 to, through and including, November 30, 2022.

This is the second request of its nature, and is made on consent of counsel for Defendants 787 Coffee LLC, and Brandon Pena (together, the “Defendants”).

The basis of this request is that Plaintiffs need additional time to complete depositions and to propound final discovery requests based on the information gleaned during Defendants’ depositions.

Defendants’ counsel has confirmed that individual defendant Brandon Pena will be attending his deposition on November 23, 2022. Additional time is needed to schedule the corporate defendant’s Fed.R.Civ.P. 30(b)(6) witness, as well as the remaining depositions for the Plaintiffs<sup>1</sup>, should Defendants’ counsel choose to conduct their remaining depositions.

For all of the foregoing reasons, it is respectfully submitted that the Court grant an extension of time to complete fact discovery and depositions from October 31, 2022 to, through and including, November 30, 2022.

Thank you, in advance, for your time and attention to this matter.

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<sup>1</sup> As of the date of this letter, the following Plaintiffs have appeared for, and participated in, their depositions: Plaintiffs Matt Rosenbaum, Sheridan Plunkett, and Travis Reilly.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel